

December 3, 2020

Via FOIA Online

Regional Freedom of Information Act (FOIA) Officer
United States Environmental Protection Agency
Pacific Southwest, Region 9
75 Hawthorne Street,
San Francisco, CA 94105

**Re: Request for Class VI Injection Well Permit Applications and Related
Records for CO₂ Geologic Sequestration Sites in California**

Dear Regional FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, I hereby request all records (whether maintained in hard copy or electronic format) held by Region 9 of the United States Environmental Protection Agency (“EPA”) regarding the following matters:

- 1) Any Class VI injection well permit applications that EPA has received in the past 12 months requesting authorization under EPA’s Underground Injection Control (“UIC”) program for geologic sequestration of carbon dioxide in California, including but not limited to any applications associated with injection sites in the vicinity of Sherman Island, California.
- 2) All “communication”¹ in the past 12 months relating to any applications identified in response to request (1) above, including all communication concerning Class VI permit applications for injection sites in the vicinity of Sherman Island, California or Mendota, California.

¹ “Communication” shall include, but is not limited to: letters, e-mails, e-mail attachments (including Word and Excel documents or Power Point presentations), SMS or other instant text messages, memoranda, briefing documents, PowerPoint presentations, agendas, voice-mails, tweets, Skype messages, Slack communications, Facebook messages, press releases, message or communication logs, and written intra-office and inter-office communications of any kind.

Regional Freedom of Information Act (FOIA) Officer
December 3, 2020
Page 2

Please provide these records to me at the following address:

Clare Ellis
Hunton Andrews Kurth LLP
50 California Street, Suite 1700
San Francisco, CA 94111

To the extent EPA claims the right to withhold any record, or portion of any record, please describe with specificity each and every record, or portion of every record, that is being withheld, along with the claimed reason for exemption, citing the exact language of the FOIA, 5 U.S.C. § 552(b), on which you rely for withholding this record, or portion thereof. In addition, please provide any non-exempt portions of documents that contain information that your office determines is exempt from disclosure under the law. 5 U.S.C. § 552(b).

EPA is required to respond to this request within twenty (20) working days. If access to the records I am requesting will take longer, please contact me with information about when I might expect copies or how I may inspect the requested records.

I agree to pay costs properly assessed in accordance with 5 U.S.C. § 552(a)(4)(A)(iv) and 29 C.F.R. § 70.40 in connection with this request. Please contact me by telephone at (415) 975-3708 or via email at CEllis@HuntonAK.com for authorization if these fees will exceed \$500.00 or if you have any other questions regarding this request. Thank you for your assistance in this matter.

Sincerely,

/s/ M. Clare Ellis

M. Clare Ellis
(415) 975-3708
CEllis@HuntonAK.com